

1 you didn't type it, is that right?

2 A No, it wasn't the questions from counsel that made  
3 me begin to believe I didn't type it. It was after perusing  
4 the list further down and looking at addresses. Because I  
5 had just saw a list of names and addresses. I hadn't paid  
6 attention to the specific addresses. And when I began to  
7 look closer at it, I saw that some of the addresses, as in  
8 the first one, David L. Brasher's address was not correct.  
9 That's when it began to come to me that I had probably never  
10 typed this list.

11 Q That's the same type of type that is on the  
12 typewriter at your company, right? DLB?

13 A It could be. I said mine has a larger print type  
14 on that other document. I would have to look at the two and  
15 compare them, but it is similar, yes. But I do not believe  
16 that I typed this list.

17 MR. ROMNEY: Excuse me, ma'am.

18 Your Honor, move to strike that and ask the Court  
19 to instruct the witness to avoid sidebar comments and only  
20 answer the questions put to her, please.

21 THE COURT: Okay. I won't strike the answer, but  
22 I'll ask you if you would just limit your answers to the  
23 questions that are asked.

24 If I want further information I'll ask you, or if  
25 Ms. Lancaster does, then she'll ask you.

1 THE WITNESS: Okay.

2 THE COURT: So just answer the specific questions.

3 THE WITNESS: Okay.

4 BY MR. ROMNEY:

5 Q Ms. Lutz, you recognize the names of all the  
6 people on this list, Exhibit 19, page 229, as persons that  
7 have licenses up in Allen, is that right?

8 A Are these the same people that are listed on the  
9 FCC --

10 Q I'm asking you.

11 A Mr. Romney, I don't know.

12 Q I'm asking you to take a look at those names that  
13 are listed there and tell this Court whether or not you are  
14 able to determine if that is a list of the people that have  
15 licenses up at the Allen station.

16 A I don't know.

17 Q Have you looked at the list, ma'am?

18 A I've looked at the list.

19 Q Have you attempted to answer my question?

20 A Yes, I have.

21 Q Let me take you back to the early days of DLB  
22 Radio, or DLB. You started to work in '86, correct?

23 A That's right.

24 Q And at that time the Brashers had an 800 system,  
25 is that right?

1 A Yes, they did.

2 Q And they sold that system, do you remember that?

3 A Yes, they did.

4 Q Do you remember approximately when they sold that  
5 system?

6 A Not approximately -- Well, approximately, maybe  
7 1990 or 1991.

8 Q If I told you it was earlier than that, '88 to  
9 '89, would you disagree with that?

10 A No.

11 Q Do you know how much the sold it for?

12 A No.

13 Q Do you know what kind of profit they made?

14 A No.

15 Q You did know at one time, right?

16 A No.

17 Q Is it your testimony today that with all the  
18 information you had about DLB from working there on a daily  
19 basis and involved in all their financial matters that you  
20 have no idea how much profit they made from the sale of that  
21 800 system?

22 A That's exactly what I'm telling you.

23 Q Yet you are able to answer questions for counsel  
24 today about how much revenue was coming in on the various  
25 aspects of the business, right?

1           A     Yes.

2           MS. LANCASTER: Your Honor, objection. Assumes  
3 facts not in evidence. I don't believe she had any  
4 testimony about how much revenue has come in.

5           MR. ROMNEY: She's clearly testified, Your Honor,  
6 as to the percentages of the different revenues that have  
7 been attributable to the different parts of the business of  
8 DLB. Ms. Lancaster went into that in great length.

9           MS. LANCASTER: I don't believe she gave any  
10 dollar amounts on revenue, Your Honor.

11          THE COURT: It was basically broken down into, I'm  
12 not going to say what percentages, --

13          THE WITNESS: May I make a comment?

14          THE COURT: No. You can only answer what's asked.

15          THE WITNESS: Okay.

16          THE COURT: The objection is overruled, but the  
17 answer will be accorded -- Well, I understand the objection  
18 and the answer and the question will be judged in light of  
19 what her previous answers were, if you know what I mean.

20          MR. ROMNEY: Thank you, Your Honor.

21          BY MR. ROMNEY:

22          Q     You had a previous FCC license prior to this one  
23 that's at issue here with the T-band system, is that right?

24          A     Yes, I did.

25          Q     I take it you kept copies of all those documents

1 about that system and license?

2 A I had copies of it at one time.

3 Q Where are they, ma'am?

4 A I threw them away.

5 Q When did you throw them away?

6 A In 1995 when I quit.

7 Q Why did you throw them away?

8 A Didn't have any reason to have them any more as  
9 far as I was concerned.

10 Q What you had at that time, ma'am, was a license  
11 for, an end user license for the 900 system, is that right?

12 A It was a license for a 900 system, yes.

13 Q It was what you understood in the business to be  
14 an end user license, is that right?

15 A I don't know what an end user license is. It was,  
16 I held a license for a 900 MHz system.

17 Q You knew at the time that you had a mobile phone  
18 in your car, right?

19 A Yes.

20 Q Back in those days?

21 A Yes.

22 Q The same time you had the license?

23 A Yes.

24 Q That was a 900 system mobile phone?

25 A Yes.

1 Q And you were aware, aren't you, ma'am, from  
2 working at DLB and your experience there that the user of  
3 the mobile phone has to have an end user license from the  
4 SEC to use a 900 system phone?

5 A I didn't know they had to, no.

6 Q But you knew you had one, right?

7 A I had a license. Whether it was an end user  
8 license or not, I don't know.

9 Q Your license that you had at that time wasn't some  
10 big station license for 90 mobiles or something like that,  
11 was it?

12 A I don't specifically remember how many units were  
13 listed on it.

14 Q You just don't remember --

15 A I had one. I had one unit. So my license was for  
16 one unit, I guess.

17 Q Have you seen any copies of that license from the  
18 FCC in the questions you had with them preparatory to this  
19 testimony today?

20 A No, I have not.

21 Q Have you asked about that?

22 A No, I have not.

23 Q Is there any particular reason why you did not  
24 inquire about your previous license with the FCC when you  
25 talked with the attorneys for the FCC?

1           A     I no longer have the license, so I didn't think it  
2     mattered. I had no reason to question it. I'm assuming I  
3     no longer have the license.

4           Q     That's just an assumption on your part?

5           A     That's just an assumption on my part. I've not  
6     received any documentation from the FCC, request for  
7     renewal. I think those things happen if you still have one.

8           Q     In fact you received all kinds of documentation  
9     from the FCC about this particular license in question on  
10    the T-band system, right?

11          A     Yes, I did. I know I received at least two  
12    documents. The license itself and, I've forgotten what the  
13    other piece was.

14          Q     You received a green card?

15          A     I don't know about -- Maybe I --

16          Q     PCIA?

17          A     I don't know if I got a green card or not.

18          Q     Did you receive a yellow card from PCIA?

19          A     I may have. I don't know.

20          Q     You do know what PCIA is, right?

21          A     No, I don't. I've heard the phrase, but I don't  
22    know what it is.

23          Q     Do you understand them to be a frequency  
24    coordinator for the FCC?

25          A     I thought that was what John Black was.

1 Q You understand John Black to be the person who  
2 prepares applications, right?

3 A Okay.

4 Q Is that what you understood?

5 A That's what I understood, yes.

6 Q Do you understand any distinction between John  
7 Black and PCIA?

8 A No. He does that, doesn't he? He doesn't  
9 do --

10 Q We're here to find out what you know, ma'am.  
11 Let's cut to the quick. There's no doubt but what  
12 you signed an application for the license for the T-band  
13 system, right?

14 A None.

15 Q You state that Ron came and asked you if you  
16 wanted to have a license, is that what your statement is?

17 A That's correct.

18 Q And you deny, do you ma'am, that you asked  
19 Patricia first whether or not you could be included on the  
20 list of license holders?

21 A I absolutely deny that.

22 Q You knew at the time that you were applying for  
23 your license for the T-band system that Norma Sumpter had  
24 signed up for a license, did you not?

25 A No, I did not.



1 Q You never talked to your sister about that?

2 A No, I did not.

3 Q Did you know that Jim Sumpter had signed up for a  
4 license?

5 A No, I did not.

6 Q Did you ever talk to Norma about Jim signing up  
7 for a license?

8 A No, I did not.

9 Q How about Melissa or Jennifer?

10 A No, I did not.

11 Q You didn't know anything about them signing up for  
12 a license at all?

13 A No, I did not.

14 Q How about David? Did you know David was signing  
15 up for a license?

16 A At that time? No.

17 Q Did you know if there were any other licenses  
18 granted to any of the people at DLB for a T-band system?  
19 How about Ron?

20 A I don't know. I've never seen any.

21 Q How about Patricia?

22 A I've never seen any.

23 Q A couple of days after you talked to Ron about  
24 this T-band license you received an application to sign?

25 A I don't know specifically when, but it would

1     probably have been no more than a couple of days.

2           Q     You recall, don't you, that at the time you had  
3     your conversation with him he did not have an application  
4     for you to sign that very first time you discussed it, do  
5     you?

6           A     Not that I can recall.

7           Q     Did Ron tell you that there was anything illegal  
8     here?

9           A     No. He told me that it was, technically it was  
10    illegal, but that there were loopholes in the law that  
11    permitted people to apply for licenses and communication  
12    companies did it all the time.

13          Q     So you knew at that time that you signed up for an  
14    FCC license that it was technically illegal for you to do  
15    what you were doing?

16          A     Yes, I did.

17          Q     You thought you were breaking the law?

18          A     I guess I did.

19          Q     And you were going to go ahead and do that and  
20    break the law?

21          A     Yes, I was.

22          Q     Just because Ron asked you to?

23          A     Yes, I was.

24          Q     For free?

25          A     Yes, I was.

1 Q You've stated that it wasn't a condition of your  
2 job to have this license, right?

3 A No.

4 Q You didn't feel any pressure at all to get this  
5 license to keep your job, did you?

6 A No, I didn't.

7 Q When you got the Net Wave petition, is that the  
8 first thing you heard about any problem with this license?

9 A Yes, it was.

10 Q It scared you, didn't it?

11 A Yes, it did.

12 Q Because you knew, or thought that you'd done  
13 something illegal?

14 A I knew I had done something illegal, Mr. Romney,  
15 and someone had obviously discovered the loophole and was  
16 coming after me for it.

17 Q And what was going to be the result of this Net  
18 Wave petition in your mind?

19 A At the very least, I could lose the license, I  
20 could be fined, I could be sued, I could go to jail. I  
21 wasn't sure.

22 Q You thought any or all of those things could  
23 happen, right?

24 A Yes, I did.

25 Q How much could you be fined?

1           A     At the time I got the Net Wave investigation, I  
2     had no idea.

3           Q     Did you ever come to learn about an amount that  
4     somebody was seeking on this particular issue?

5           A     Not on the Net Wave investigation. Now on this  
6     second investigation some of the paperwork that came to my  
7     home, down in one of the footnotes at the bottom it said  
8     that the FCC could fine a person who held a license  
9     illegally for an amount of money up to \$82,000, some amount  
10    beginning with a dollar, I guess, up to \$82,000. Whatever  
11    they wanted to between that figure.

12          Q     Let me turn your attention to Exhibit 63, please.

13          A     This book over here?

14          Q     Yes, ma'am.

15          A     Okay.

16          Q     That's a document you submitted?

17          A     Yes, it is. Yes, it is.

18          Q     Did you tell the FCC anywhere in that particular  
19    document, ma'am, that you knew this was illegal when you did  
20    it in the first place?

21          A     Without reading the entire document here again, I  
22    don't know.

23          Q     Take your time.

24               MR. ROMNEY: Well, I'll ask the Court if she can  
25    read that during lunch, and I'll come back and visit that

1 issue again, if that's okay with Your Honor.

2 THE COURT: Sure.

3 BY MR. ROMNEY:

4 Q How about Exhibit 64?

5 A Excuse me, just a moment.

6 I would like to write down the question so that I  
7 can remember what it is that you want me to read this to  
8 find.

9 Q Feel free, ma'am.

10 A Can I write it on the top of this document?

11 Q No, ma'am. You may not.

12 MS. LANCASTER: I'll give you a pencil and piece  
13 of paper.

14 (Pause)

15 THE WITNESS: Okay, the question again please, Mr.  
16 Romney.

17 BY MR. ROMNEY:

18 Q I want you to review Exhibit No. 63 during the  
19 lunch break, ma'am, and tell me if you told the FCC in there  
20 that you knew what you were doing was illegal from the very  
21 beginning of the application for the license process.

22 THE COURT: And 64?

23 MR. ROMNEY: Yes, sir. Please.

24 BY MR. ROMNEY:

25 Q Also 64, ma'am. As well. When we get to that

1 lunch break.

2 A Okay.

3 Q Just before we go to that lunch break, please, did  
4 you have a chance to meet with counsel for the FCC prior to  
5 appearing today?

6 A Since coming to Washington or back in December?

7 Q Since coming to Washington.

8 A Yes.

9 Q When did you meet with them?

10 A I met with Ms. Lancaster this morning before  
11 coming in here.

12 Q Did you have any other occasions to meet or  
13 discuss issues pertaining to the testimony you would be  
14 giving other than that one occasion this morning?

15 A I met with her a couple of times last week when I  
16 was waiting to know whether or not I was going to testify,  
17 and they'd tell me no, to come back tomorrow, or things of  
18 this nature.

19 Q Did you have occasion at that time to go over any  
20 documents in preparation for your testimony today?

21 A I went over some documents this morning.

22 Q Could you tell the Court please what documents you  
23 went over?

24 A Ms. Lancaster asked me to review the management  
25 agreement that I had proposed to Ron in answer to his

1 request for one. She asked me to go through it and see if I  
2 couldn't mark changes, where I had made changes.

3 Q Any other documents, ma'am?

4 A No. That's the only document that I looked at.

5 Q Was there any discussion about what other  
6 witnesses testified about in this matter?

7 A No, there was not.

8 Q Were you told in fact specifically that you could  
9 not discuss that?

10 A No, I was not.

11 Q Is there any other document that you've reviewed  
12 on your own, ma'am, in preparation for your testimony today?

13 A Reviewed my deposition that I gave back in  
14 December.

15 Q Did you make any changes to your deposition,  
16 ma'am?

17 A I made a few changes to the -- Are you talking  
18 about when I sent it back after I signed -- Yeah, I made a  
19 few changes at that time.

20 Q Do you know what changes you made?

21 A There was a lot of misspelling of some names,  
22 there was a couple of dates that were changed, but basically  
23 that was all.

24 Q What dates were changed, ma'am? Do you remember?

25 A I think there was a date in there where they said

1 I had gone to work or something in 1999 when it had actually  
2 occurred in 1996.

3 Q Any other dates that you recall changing?

4 A Not off the top of my head, no.

5 Q Did you fill out an errata page that had these  
6 changes?

7 A Yes, I did.

8 Q Do you know whatever happened to that?

9 A I mailed it back in with the deposition.

10 Q You mailed that to who, to the Reporter?

11 A No, to the FCC.

12 Q Okay.

13 MS. LANCASTER: If I might interject, Your Honor,  
14 if we received it I should have it right here. I'll be  
15 happy to show it to him.

16 THE COURT: If Mr. Romney would like you to.

17 MR. ROMNEY: I would certainly appreciate a chance  
18 to see her errata page, Your Honor.

19 MS. LANCASTER: I'm looking for it right now.

20 (Pause)

21 THE COURT: Off the record.

22 (Whereupon, a luncheon recess was taken from 11:55  
23 a.m. to 1:15 p.m.)

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1 missing?

2 MR. ROMNEY: No, ma'am. That is the one with the  
3 handwritten changes by the witness.

4 MS. LANCASTER: Okay. So six is 21?

5 MR. ROMNEY: Yes, ma'am. It's identified as the  
6 same October 13, 1999 letter, although it says receipt copy  
7 at the top in block stamp, it has a receipt stamp October  
8 14th from the FCC.

9 THE COURT: Let me mark them for identification  
10 before we go any further.

11 RB/PB Exhibit 5 for identification is a five page  
12 document dated October 7, 1999 and it's a letter to Gary  
13 Schonman, S-C-H-O-N-M-A-N.

14 (The document referred to was  
15 marked for identification as  
16 RB/PB Exhibit No. 5.)

17 And it's got handwriting across the top which I  
18 want Mrs. Lutz to read for me since half of mine's missing.

19 THE WITNESS: Part of mine is torn off, too. It  
20 says, questions answered -- Part of mine is torn off also.

21 MS. LANCASTER: I have a copy that's got it all,  
22 Your Honor.

23 THE COURT: Okay.

24 THE WITNESS: It says, "Questions answered to FCC  
25 and permission for RB's attorney to represent me."

1 THE COURT: Okay. That's the first document.  
2 That's RB/PB Exhibit 5.

3 (Pause)

4 THE COURT: And the second document --

5 MR. WILSON: Excuse me, Your Honor.

6 THE COURT: Yes.

7 MR. WILSON: We don't have a copy of RB/PB 5.

8 (Pause)

9 MS. LANCASTER: Here's another copy.

10 MR. WILSON: Thank you.

11 MR. ROMNEY: Your Honor, I would request --

12 THE COURT: I didn't finish my identification of  
13 number six.

14 RB/PB Exhibit No. 6 for identification is a five  
15 page document, and it's a letter to Gary Schonman dated  
16 October 13, 1999, and across the top, above the letterhead,  
17 it's marked receipt copy.

18 (The document referred to was  
19 marked for identification as  
20 RB/PB Exhibit No. 6.)

21 MR. ROMNEY: Your Honor, I request that the  
22 witness be given an opportunity, and I apologize for not  
23 doing this on the lunch. I just discovered all these copies  
24 on the lunch break, that she be given a chance to read  
25 through Exhibit 5, RB/PB 5 for identification and RB/PB 6

1 for identification, to satisfy herself as to the contents of  
2 those documents.

3 THE WITNESS: During lunch I read Exhibit No. 6  
4 and Judy Lancaster gave me a copy of Exhibit No. 5, which  
5 had my handwritten changes made on it. The reason I was  
6 questioning Exhibit No. 6 was because it didn't have my  
7 handwritten notations made on it, so I didn't realize that  
8 it had been retyped and my answers put in similarly to the  
9 way I had made the written changes.

10 Does that --

11 BY MR. ROMNEY:

12 Q Ms. Lutz, I would ask you please to compare -- I  
13 will point out to you that Exhibit No. 6 and Exhibit No. 5  
14 appear to have an additional page as compared with that  
15 which was shown you under Exhibit No. 21.

16 A So you're saying that originally it only had seven  
17 questions, and then now it's got nine?

18 Q No, ma'am. I'm saying it originally had nine  
19 questions and somehow in the preparation of the exhibits for  
20 this testimony today or for this court hearing, the pages  
21 that had answers to eight and nine was left off and your  
22 signature page was inserted as number 16 of Exhibit No. 21.  
23 Do you see that?

24 I'm sorry, go to the big book. It's got Exhibit  
25 No. 21.

1 THE WITNESS: This book?

2 THE COURT: Yes.

3 MS. LANCASTER: If I might interject, Your Honor,  
4 we will stipulate that the third page of Exhibit, what was  
5 Exhibit 21, the third page of this letter of Ms. Lutz, was  
6 inadvertently omitted in the Bureau's direct case.

7 THE COURT: Probably a collating error, huh?

8 MS. LANCASTER: Probably.

9 BY MR. ROMNEY:

10 Q Have you had a chance to look at page 14 of  
11 Exhibit 21, ma'am?

12 A I haven't got to it yet. I'm still page turning.

13 MS. LANCASTER: It begins on page 14.

14 THE WITNESS: I've got it now. There was a page  
15 missing, yes, I see that. And now this represents it. Yes.

16 THE COURT: When you said this you pointed to  
17 RB/PB Exhibit 6.

18 THE WITNESS: Yes. RB/PB Exhibit No. 6 has been  
19 given to me with the third page attached to it.

20 BY MR. ROMNEY:

21 Q Exhibit No. RB/PB No. 5. Do you have that in  
22 front of you?

23 A Yes, I do.

24 Q That is the document upon which you made your  
25 handwritten changes and forwarded them to counsel, to the

1 best of your knowledge?

2 A This is a copy of the document that I made  
3 handwritten changes on and gave it back to Ronald Brasher.

4 MR. ROMNEY: Your Honor, I'd move the admission or  
5 RB/PB Exhibit No. 5.

6 MS. LANCASTER: No objection, Your Honor.

7 MR. WILSON: No objection, Your Honor.

8 THE COURT: RB/PB Exhibit 5 is received.

9 (The document referred to,  
10 having been previously marked  
11 for identification as RB/PB  
12 Exhibit 5 was received in  
13 evidence.)

14 BY MR. ROMNEY:

15 Q Ms. Lutz, I would ask you to look at Exhibit No.  
16 6, RB/PB Exhibit 6 for identification.

17 A Okay.

18 Q And if you have not previously had an opportunity,  
19 I would like you to take one now and read it to assure  
20 yourself --

21 A I've read the document and it basically represents  
22 the changes that I made in Exhibit No. 5.

23 Q Absent the use of the first person in which you  
24 put in Exhibit No. 5, and using the third person as in  
25 Exhibit No. 6, are there any other substantive changes that

1     you're aware of, ma'am?

2             A     Not that I saw, no.

3             Q     And the intent that you had in answering those  
4     questions was accurately portrayed to the FCC to the best of  
5     your knowledge?

6             A     Yes.

7             Q     In Exhibit No. 6?

8             A     Yes, that is correct.

9             MR. ROMNEY: Your Honor, I move the admission of  
10    RB/PB Exhibit No. 6.

11            MS. LANCASTER: No objection.

12            MR. WILSON: No objection.

13            THE COURT: RB/PB Exhibit 6 is received.

14                               (The document referred to,  
15                               having been previously marked  
16                               for identification as RB/PB  
17                               Exhibit 6 was received in  
18                               evidence.)

19            THE WITNESS: May I state what my original  
20    objection to it was?

21            THE COURT: No, not unless you're asked.

22            THE WITNESS: Okay.

23            BY MR. ROMNEY:

24            Q     The last page of RB/PB Exhibit No. 6, ma'am, does  
25    it bear your signature?

1           A     The one, authorization of representation, Carolyn  
2     Lutz?

3           Q     Yes, ma'am.

4           A     Yes, that is correct.

5           Q     You signed that document?

6           A     Yes, I did.

7           Q     And you understood at the time you signed that  
8     that you were authorizing Schwaninger & Associates to  
9     represent your interest in, pertaining to the order to show  
10    cause filed by Net Wave?

11          A     Yes.

12          Q     You were asked a question about the Net Wave  
13    petition, Exhibit No. 1. Do you recall the questions you  
14    were asked about that this morning? Please open the volume  
15    to Exhibit 1 if that helps you.

16                   (Pause)

17          Q     Do you see that document?

18          A     Petition to show cause. Yes.

19          Q     Exhibit No. 2 as well, do you see Exhibit No. 2?

20          A     Yes. The opposition to it.

21          Q     You understood at all times, ma'am, did you not  
22    around this timeframe that the opposition was filed that  
23    Ron's attorneys were going to be handling this matter on  
24    your behalf?

25          A     I understood that his attorneys were handling the



1 matter, yes, on my behalf. The document that I signed here  
2 for RB/PB Exhibit No. 6, gave them permission to handle it.

3 My impressions were that this is what the answers  
4 were, that this was what they -- This is what they had  
5 answered to all of these documents. I never saw the one  
6 shown over here as number two as the opposition. The only  
7 documents I ever saw that I, was this one. This little five  
8 page, six page, however many pages it's got, this is what I  
9 understood to be the response to the Net Wave issues.

10 THE COURT: Let the record reflect that throughout  
11 her answer when Mrs. Lutz said this, she was referring to  
12 RB/PB Exhibit No. 6. Is that correct, Mrs. Lutz?

13 THE WITNESS: Yes, that's correct.

14 MR. ROMNEY: Move to strike the answer, Your  
15 Honor, as non-responsive. That wasn't even the question in  
16 front of the witness regarding that.

17 THE COURT: Okay. Granted.

18 Please just answer the questions and Ms. Lancaster  
19 will have an opportunity to ask you to explain if she wants  
20 to.

21 BY MR. ROMNEY:

22 Q When you received Exhibit No. 1, the Net Wave  
23 petition, did you have a conversation with Mr. Ronald  
24 Brasher about that?

25 A Yes, I did.

1           Q     Did he assure you in that conversation that his  
2 attorneys would handle any response on your behalf to that  
3 petition?

4           A     Yes, he did.

5           Q     And even though you never saw Exhibit No. 2, or at  
6 least you've testified today that you never saw Exhibit No.  
7 2, you understood that Ronald Brasher's attorneys would be  
8 handling it for you.

9           A     Yes, I did.

10          Q     During the break I had asked you to review  
11 Exhibits No. 63 and No. 64. Do you recall my asking you to  
12 do that?

13          A     Yes.

14          Q     I asked you specifically to review those documents  
15 and demonstrate for me please where in those documents you  
16 advised the FCC that you had understood from the very  
17 beginning of your dealings with Mr. Brasher regarding the T-  
18 band account that what you were doing was illegal.

19                   Would you show that for me, please?

20          A     I don't remember that that's the question you  
21 asked me.

22          Q     Well, the record will reflect the question I  
23 asked.

24          A     Okay. Ask the question again, Mr. Romney.

25          Q     I asked you, ma'am, to review during the lunch

1 time and demonstrate to this Court where in Exhibit 63 or 64  
2 you advised the FCC that you knew that this T-band licensing  
3 was illegal from the beginning of your involvement in it.

4 A After reading the document, no place in here does  
5 it state that.

6 Q Thank you.

7 You are not alleging in this case, are you ma'am,  
8 that anybody ever forged your name?

9 A No, I'm not.

10 Q You're not alleging in this case that you had any  
11 participation in the filing of any applications on behalf of  
12 a deceased person?

13 A No.

14 Q In fact you never had any discussions with  
15 anybody, including Ronald Brasher, about filing applications  
16 on behalf of deceased people, did you?

17 A No, I didn't.

18 Q You don't know anything about that, do you?

19 A No.

20 Q I'd ask you to turn to Exhibit No. 62, please. I  
21 believe this is the management agreement you testified to,  
22 about that you received from Mr. Brasher, is that correct?

23 A I presume it is. I don't know without my notes at  
24 the top, or the ones that I brought to the deposition. I  
25 guess so, but other than that, I don't know.